

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 23-CV-20045-RKA

ERIC & CO TRADING GROUP LLC,

Plaintiff/Judgment Creditor,

v.

FLOYD MAYWEATHER, JR.,

Defendant/Judgment Debtor,

and

JP MORGAN CHASE BANK, N.A. and
ENHANCE HEALTH LLC,

Garnishees.

JOINT MOTION FOR APPROVAL OF STIPULATED PROTECTIVE ORDER

Plaintiff/Judgment Creditor Eric & Co Trading Group LLC and Defendant/Judgment Debtor Floyd Mayweather, Jr. move for the entry of a protective order, under Federal Rule of Civil Procedure 26(c) and Local Rules 26.1 and 7.1, to govern the use and dissemination of all information, documents, or materials that are produced in this action and designated as confidential.

INTRODUCTION

This case is in post judgment proceedings. Plaintiff is using discovery in aid of execution to satisfy its judgment. Having said that, the parties will exchange confidential and sensitive financial information through discovery. The parties anticipate that that other confidential and sensitive information will be produced during discovery. Therefore, the parties agree to a

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Stipulated Protective Order (attached as Exhibit “1”) that will promptly facilitate discovery in aid of execution while also affording protection to any materials designated as confidential consistent with Rule 26 and other applicable state and federal law.

MEMORANDUM OF LAW

Courts can issue protective orders to govern the dissemination of information received through discovery:

(c) Protective Orders. (1) *In General.* A party or any person from whom discovery is sought may move for a protective order in the court where the action is pending The court may, for good cause, issue an order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense, including one or more of the following:

. . . .

(B) specifying terms, including time and place or the allocation of expenses, for the disclosure or discovery.

Fed. R. Civ. P. 26(c)(1)(B).

Discovery materials are not regarded as public components of a civil trial. *Seattle Times Co. v. Rhinehart*, 467 U.S. 20, 33 (1984). Moreover, parties “regularly agree, and courts often order, that discovery information will remain private.” *United States v. Anderson*, 799 F.2d 1438, 1441 (11th Cir. 1986); *Chicago Trib. Co. v. Bridgestone/Firestone, Inc.*, 263 F.3d 1304, 1316 (11th Cir. 2001) (“That is why parties regularly agree, and courts often order, that discovery information will remain private); *United States v. Atesiano*, No. 18-20479-CR, 2018 WL 5831092, at *4 (S.D. Fla. Nov. 7, 2018) (same).

Here, the parties anticipate that they will exchange confidential and sensitive financial information throughout the discovery process. Therefore, the parties respectfully request that this Court grants this motion and approve and enter the Stipulated Protective Order Attached as **Exhibit “1”**.

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Dated: December 13, 2023

Respectfully submitted,

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